



April 19, 2010
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However, finding one will remain open until we verify the implementation of your stated corrective action plan during a future on-site review. Until then, this finding is assigned Corrective Action Tracking System (CATS) number 10048.

BACKGROUND

The Golden Sierra allocated all of its \$1,239,046 ARRA youth allotment to serve 250 SYP participants. As of the week of August 31, 2009, Golden Sierra expended \$1,184,679 to serve 249 SYP participants.

ARRA SYP REVIEW RESULTS

While we concluded that, overall, Golden Sierra is meeting applicable ARRA requirements, we noted instances of noncompliance in the areas of work permits and work readiness. The findings that we identified in these areas, our recommendations, and the Golden Sierra proposed resolution of the findings are specified below.

FINDING 1

Requirement: California Education Code Section 49160 states, in part, that no person, firm or corporation shall employ, suffer, or permit any minor under the age of 18 years to work in or in connection with any establishment or occupation, except as provided in Section 49151, without a permit to employ, issued by the proper educational officers in accordance with law.

California Labor Code Section 1299 states, in part, that every person, or agent or officer thereof, employing minors, either directly or indirectly through third persons, shall keep on file all permits and certificates, either to work or to employ.

Observation: We observed that Golden Sierra did not have work permits for seven minor participants. Specifically, the participants were working between 2-7 days prior to the issuance of the work permit.

Recommendation: We recommended that Golden Sierra provide the Compliance Review Office (CRO) with a Corrective Action Plan (CAP), including a timeline, for ensuring that all minor youth be issued a work permit prior to placement in a work activity.

**Golden Sierra
Response:**

Golden Sierra stated it would require that a valid work permit must be on file in Golden Sierra's Administrative Office prior to any minor under the age of 18 being allowed to begin a work activity.

State Conclusion: Golden Sierra's stated corrective action should be sufficient to resolve this issue. However, we cannot close this issue until we verify, during a future on-site visit, the Golden Sierra's successful implementation of its stated corrective action. Until then, this issue remains open and has been assigned CATS number 10048.

FINDING 2**Requirement:**

WIA Section 136(b)(2)(A)(ii) states, in part, that youth activities shall include: (1) attainment of basic skills, work readiness or occupational skills; (2) attainment of secondary school diploma and their recognized equivalents; and (3) placement and retention in postsecondary education or advanced training, or placement and retention in military service, employment, or qualified apprenticeships.

The Department of Labor, Training and Employment Guidance Letter (TEGL) 14-08 states, in part, that the work readiness portion of the skill attainment rate will be the only indicator used for youth that participate in "summer employment" only. The basic and occupational skills portions of the skill attainment rate and the literacy/numeracy gains measure will not be required for youth that participate in summer employment only. In addition, no other WIA or common measure indicator will be required for youth in summer employment only.

TEGL14-08 goes on to state, local areas should follow the definition for a work readiness skill goal as specified in TEGL No. 17-05, Attachment B Definition of Key Terms found at http://wdr.doleta.gov/directives/attach/TEGL17-05_AttachB.pdf. The key part of the definition is the need for local areas to determine whether a measureable increase in work readiness skills has occurred. States and/or local areas should establish a methodology for determining work readiness skills upon beginning and completing the summer experience in order to determine whether a measurable increase has occurred.

TEGL17-05 defines, in part, that Work Readiness Skills Goal is a measurable increase in work readiness skills including world-of-work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviews, applications, and follow-up letters).

Workforce Services Directive 08-8 states, in part, that the work readiness portion of the original Youth Skill Attainment Rate will be the performance indicator used for youth that participate in summer work experience.

Observation: We observed that Golden Sierra's Placer County One-Stop did not complete the work readiness pre-test for six participants to establish the basis for a measurable increase in the participants work readiness skills. Golden Sierra's Placer County One-Stop stated that they measure the youth skill attainment rate by the work readiness pre- and post-testing. However, six participant case files did not contain a completed work readiness pre-test.

Recommendation: We recommended that Golden Sierra provide CRO with a copy of the completed work readiness pre-test for the six SYP participants as specified.

Golden Sierra Response: Golden Sierra stated in their response that the case manager had the pre-test forms on her desk at the time of the monitoring review. The pre-test forms had been completed at the beginning of participation in the program; subsequent to the review, Golden Sierra provided copies of the six missing pre-tests that contained the participant's signature and dated back to the beginning of the SYP.

State Conclusion: We consider this finding resolved.

Because the methodology for our monitoring review included sample testing, this report is not a comprehensive assessment of all the areas included in our review. It is Golden Sierra's responsibility to ensure that its systems, programs, and related activities comply with the ARRA grant program, federal and state regulations, and applicable state directives. Therefore, any deficiencies identified in subsequent reviews, such as an audit, would remain Golden Sierra's responsibility.

Please extend our appreciation to your staff for their cooperation and assistance during our review. If you have any questions regarding this report or the review that was conducted, please contact Ms. Mechelle Hayes at (916) 654-1292.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessie Mar". The signature is fluid and cursive, with the first name "Jessie" written in a larger, more prominent script than the last name "Mar".

JESSIE MAR, Chief
Compliance Monitoring Section
Compliance Review Office

cc: Linda Beattie, MIC 50
Greg Gibson, MIC 50
Jose Luis Marquez, MIC 50
Daniel Patterson, MIC 45